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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,
20 Plaintiff,
21 v.
22 UBER TECHNOLOGIES, INC.,
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,
24 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF DEFENDANTS'
SUPPLEMENTAL BRIEFING
REGARDING MOTION TO
COMPEL ARBITRATION
HEARING'S QUESTIONS 3 AND 4
(DKT. 263) AND ADDITIONAL
QUESTIONS FROM THE COURT**

Trial Date: October 2, 2017

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,
 2 Defendants Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC (“Defendants”)
 3 submit this motion for an order to file under seal the confidential, unredacted versions of portions
 4 of Defendants’ Supplemental Briefing Regarding Motion to Compel Arbitration Hearing’s
 5 Questions 3 and 4 (Dkt. 263) and Additional Questions from the Court (“Supplemental Brief”).

6 The redacted portions of the Supplemental Brief discuss Uber’s highly confidential
 7 strategy and plans for the future relating to Uber’s LiDAR system and technology. (Declaration
 8 of Meredith R. Dearborn In Support of Defendants’ Administrative Motion to File Documents
 9 Under Seal (“Dearborn Decl.”) ¶ 3.) Public disclosure of this information would cause harm to
 10 Uber by giving Uber’s potential competitors access to Uber’s non-public strategy information and
 11 business plans. (Dearborn Decl. ¶¶ 3–4.)

12 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the
 13 document at issue, with accompanying Chambers copies.

14 Defendants’ served Waymo with this Administrative Motion to File Under Seal on May 1,
 15 2017.

16 For the foregoing reasons, Defendants request that the Court enter the accompanying
 17 Proposed Order granting Defendants’ Administrative Motion to File Under Seal and designate the
 18 service copies of this document as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
 19 ONLY.”

20 Dated: May 1, 2017

MORRISON & FOERSTER LLP

22 By: /s/ Arturo J. González

ARTURO J. GONZÁLEZ

24 Attorneys for Defendants
 25 UBER TECHNOLOGIES, INC.,
 26 OTTOMOTTO LLC, AND OTTO TRUCKING,
 27 LLC
 28

ATTESTATION OF E-FILED SIGNATURE

I, Meredith R. Dearborn, am the ECF User whose ID and password are being used to file this Brief. In compliance with General Order 45, X.B., I hereby attest that Arturo J. González has concurred in this filing.

Dated: May 1, 2017

/s/ Meredith R. Dearborn

Meredith R. Dearborn